

The Premcor Refining Group  
AFS Plant ID 10-003-00016

The following are EPA's comment on the draft Part 3 Title V permit:

1. After discussion with Ravi Rangi I now understand now where to look when the permit refers to "See "Conditions Applicable to Multiple Pollutants in this Table" but I think that this is unclear to the reader as written. To make it clearer I suggest the following wording - "See Conditions Applicable to Multiple Pollutants in this Table - Emission Unit 80, 82, 83 and 84 were appropriate or mention the subparagraph for each. Please explain or correct the permit.
2. Condition 3 Table 1, Emission Unit 82 paragraph (b)(1)(i) refers to 40 CFR 60, Subpart VV under the record keeping and reporting requirements in addition to what is listed in the permit should the permit also indicate that the facility need to do record keeping and reporting according to 40 CFR 60, Subpart VV. Please explain or correct the permit.
3. Under Condition 3 Table 1(b)(1)(i)(A) the permit indicated the 40 CFR 60, Subpart VV but this is not indicated on the checklist. Please correct.
3. Under Condition 3 Table 1(d)(1)(ii) the acronym LSDF should be spelled out when using for the first time in the permit, i.e., Low Sulfur Diesel Fuel (LSDF). Please explain or correct.
4. Under Condition 3 Table 1(e)(2) Odor - since odor is enforced by the State only, the permit should indicate that Odor is State Enforceable Only.